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THE HOOVER COMPANY

NORTH CANTON, OHIO 44720, TEL. 216-439-9200

REPLY TO
EXECUTIVE OFFICES

November 19, 1981

Mrs. Kathy Homer
Environmental Protection Agency Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mrs. Homer:

Please find enclosed The Hoover Company's closure plan for its dewatering bed treatment and storage facility (the facility). This facility handles a waste sludge consisting of hazardous waste sludge from Hoover's nickel/zinc plating process and various other non-hazardous wastes.

Effective November 1, 1981, a new plating process was installed whereby all hazardous sludges will be captured and placed in individual containers for off-site disposal.

As of this date (November 1st), the facility was no longer used to treat or store hazardous wastes, and Hoover will, consistent with its closure plan, remove all hazardous wastes from the facility to a permitted disposal site.

Accordingly, Hoover hereby requests the Regional Administrator's approval of the attached closure plan. In the event you have any questions regarding this closure plan, please contact either Mr. H. W. Emrick, Environmental Control Manager for The Hoover Company, or the undersigned.

Thank you for your cooperation in this matter.

Sincerely,

John R. Spidle
John R. Spidle
Attorney

Enclosure

RECEIVED
NOV 21 1981
WASTE MANAGEMENT DIVISION
EPA REGION V

*Closure plan
approved -
K. Homer
12/17/81*

CLOSURE PLAN FOR DEWATERING BEDS
AND RELATED STORAGE FACILITY
LOCATED AT THE HOOVER COMPANY
PLANT NO. 1

1. Description of facility

The dewatering facility (the facility) is listed in Hoover's EPA Permit Part A (ID No. OHD00044621) under process code T04. This facility treats and temporarily stores the hazardous waste sludge from Hoover's nickel-zinc plating process along with other non-hazardous wastes. The facility is two man-made depressions (each approximately 40 ft. x 100 ft.) and consists of plastic liners and sand base filter bed enclosing drainage pipes. The water processed through the facility is removed through the drain pipes and is discharged in accordance with Hoover's NPDES permit. The sludges stored at the facility will be removed periodically and transferred to a permitted waste disposal site.

2. Description of when and how the facility will be closed

The life of the facility is indeterminable since the stored sludges are periodically removed. The facility will be closed by employing a permitted waste disposal contractor to remove the hazardous waste to a permitted land disposal site and by complying with the EPA closure regulations.

3. Estimated maximum volume of waste at the facility

The maximum volume of wastes the facility can store is estimated to be 600 cubic yards.

4. Decontamination of facility equipment

The sand beds, liner, piping and other equipment will be examined and tested and, if necessary, decontaminated or removed to a permitted disposal site in accordance with Reg. 265.114 and 265.228 (a) or (b).

5. Estimated year of closure and schedule for final closure

The year of closure is indeterminable since the stored sludges are periodically removed. It is estimated all wastes can be removed from the facility within a one week period.

6. Other Regulatory Requirements

- (a) Reg. 265.111 - Under the Closure Plan, all hazardous wastes will be removed to a permitted disposal site. All equipment connected with the facility will be inspected and if necessary decontaminated or removed as set forth in Item No. 4 above. Under the Plan, no migration of hazardous waste into the surrounding environment should occur.
- (b) Reg. 265.113 - All hazardous wastes will be removed as soon as reasonably possible after the facility is no longer utilized for storing hazardous wastes. It is anticipated this waste can be disposed of within 90 days after receiving the final volume of hazardous wastes.
- (c) Reg. 265.114 - See Item No. 4 above.
- (d) Reg. 265.115 - An independent registered engineer will be employed to certify that closure has been made in accordance with the Plan as approved by the Regional Administrator.
- (e) Reg. 265.197 - See Item No. 2, 4, and 6 (a) above.
- (f) Reg. 265.228 - See Item No. 2, 4, and 6 (a) above. Under the plan, no post-closure care should be required.
- (g) Reg. 265-280 - This facility was designed and operated in a manner reasonably calculated to prevent the migration of hazardous wastes. See Item No. 1 and 6 (a) above.
- (h) Reg. 265.310 - The facility should not be considered a Landfill under the regulations.
- (i) Reg. 265.351 - This regulation is only applicable to Incinerators.
- (j) Reg. 265.381 - This regulation is only applicable to Thermal Treatment facilities.
- (k) Reg. 265.404 - See Item No. 4 above.

7. The estimated cost of closing the facility is determined as follows:

(a)	Estimated cost of removal to permitted disposal site	\$75,000
(b)	Estimated cost to inspect, test and/or decontaminate facility equipment	\$ 500
(c)	Estimated cost of independent certification of closure	\$ 100
(d)	Contingency (10% of immediately the preceding (a), (b), and (c))	\$ 7,500
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		\$83,100